

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,
OPENAI OPCO LLC, OPENAI GLOBAL LLC,
OAI CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendant.

Civil Action No. 1:23-cv-11195

**DECLARATION IN SUPPORT OF
MOTION FOR ADMISSION OF
ATTORNEY PRO HAC VICE**

Emily K. Cronin, declares:

1. I am an Associate with the law firm of Susman Godfrey L.L.P.
2. I submit this declaration in support of my motion for admission to practice pro hac vice in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the Supreme Court of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have never been convicted of a felony.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
7. My attorney registration number for the State Bar of California is 322683.

8. Wherefore, your declarant respectively submits that she be permitted to appear as counsel and advocate pro hac vice in case 1:23-cv-11195 for Plaintiff (The New York Times Company).

I, Emily K. Cronin, declare under penalty of perjury that the foregoing is true and correct.

Dated: February 1, 2024

Respectfully submitted,

/s/ Emily K. Cronin

Emily K. Cronin (Pro Hac Vice)
CA State Bar No. 322683
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The New York Times Company